

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA**

ECOLAB Inc., and NALCO COMPANY,  
LLC d/b/a Nalco Water, an Ecolab Company  
and/or Nalco Water,

*Plaintiffs,*

v.

ANTHONY RIDLEY and CHEMTREAT,  
INC.,

*Defendants.*

Case No. 1:22-cv-00050

District Judge Travis R. McDonough

Magistrate Judge Christopher H. Steger

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**JOINT SUBMISSION OF PROPOSED JURY INSTRUCTIONS AND VERDICT FORMS**

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Pursuant to the Court's August 24, 2023 Amended Scheduling Order and Local Rule 51.1, Defendants Anthony Ridley and ChemTreat, Inc. and Plaintiffs Ecolab Inc. and Nalco Company, LLC (collectively, the "Parties"), by and through undersigned counsel, submit the attached proposed jury instructions and verdict forms. The Parties cooperatively conferred about their proposed jury instructions and verdict forms on October 12, 2023. However, after conferring, several areas of disagreement remain. Accordingly, the proposed jury instructions attached herein provide competing instructions, as directed by the Court's Amended Scheduling Order. Doc. 362 ¶ 4. The Parties were unable to reach an agreement on their proposed verdict forms and are therefore submitting separate proposed verdict forms for the Court's consideration.

Attached as **Exhibit 1** are the Parties' joint proposed jury instructions. Attached as **Exhibit 2** is Defendants' proposed verdict form. Attached as **Exhibit 3** is Plaintiffs' proposed verdict form.

DATED: October 13, 2023

Respectfully submitted,

/s/ Troy C. Homesley

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